

KING & SPALDING

King & Spalding LLP
1700 Pennsylvania Avenue, NW
Suite 200
Washington, DC 20006-4707
Tel: +1 202 737 0500
Fax: +1 202 626 3737
www.kslaw.com

Thomas J. Spulak
Direct Dial: +1 202 661 7948
tspulak@kslaw.com

VIA HAND DELIVERY
VIA U.S. MAIL

February 21, 2014

Mr. Jeff S. Jordan
Office of the General Counsel
Federal Election Commission
999 E Street, NW
Washington, DC 20463

RE: MUR 6748

Dear Mr. Jordan:

We are writing to you on behalf of our client, the Pharmaceutical Research and Manufacturers of America ("PhRMA"), in regards to your recent letter informing PhRMA that the complainant in MUR 6748 has provided the Federal Election Commission (the "FEC" or "Commission") with additional information. We appreciate this opportunity to respond. After reviewing the additional information, we note that it is neither relevant nor new.

The additional information regarding Footnote 1 serves merely to complete the legal citation for an article that, *inter alia*, provides readily publicly-available information regarding the lobbying expenditures of PhRMA. Moreover, PhRMA's constitutionally-protected right to engage in lobbying is irrelevant to the allegations contained in the original complaint.

The copy of the email provides no new information from that which was already described fully in the original complaint. It adds nothing to the complaint; any issues raised by the complainant regarding the email were addressed by PhRMA in its response to the Commission dated November 25, 2013.

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In conclusion, the additional information does nothing to alter our position that there is no basis to any suggestion or claim that PhRMA violated the Federal Election Campaign Act of 1971, as amended ("FECA"), or its accompanying regulations. Accordingly, we reiterate our request that the Commission find no reason to believe that PhRMA violated FECA or its accompanying regulations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Th. Spulak', followed by a horizontal line.

Thomas J. Spulak